



U.S. Department of Justice

United States Attorney
Southern District of New York**MEMO ENDORSED****BY ECF**

The Honorable Valerie E. Caproni
 United States District Judge
 Southern District of New York
 40 Foley Square
 New York, NY 10007

The Silvio J. Mollo Building
 One Saint Andrew's Plaza
 New York, New York 10007

August 28, 2023

USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC #: _____
 DATE FILED: 08/29/2023

Re: *United States v. Joel Cosme Figueroa et al., 22 Cr. 582 (VEC)*

Dear Judge Caproni:

The parties respectfully request a two-week extension of their time to file motions in limine, from September 1, 2023 to September 15, 2023, and a one-week extension of the time to file replies to motions in limine, requests to charge, and voir dire, from September 15, 2023 to September 22, 2023. Trial is scheduled in this case to commence on October 23, 2023. Two of the three defendants are in advanced plea negotiations with the Government and are unlikely to proceed to trial. For the third defendant, counsel are engaged in discussions regarding various issues that may obviate the need to file certain in limine motions. Finally, the Government is contemplating imminently seeking a superseding indictment that, while not changing the quantum of evidence or discovery in this case, could expand the time frame of the charged conspiracy or add additional drug types (e.g., fentanyl) that may similarly obviate the need for certain in limine motions. All defendants consent.

Motions *in limine* are due on **September 8, 2023**. Responses to motions *in limine*, requests to charge, and voir dire questions are due **September 15, 2023**.

SO ORDERED.

Valerie Caproni
 08/29/2023

HON. VALERIE CAPRONI
 UNITED STATES DISTRICT JUDGE

Respectfully submitted,

DAMIAN WILLIAMS
 United States Attorney for the
 Southern District of New York

by: /s/
 Jane Y. Chong/Matthew R. Shahabian
 Assistant United States Attorneys
 (212) 637-2263/-1046

cc: Counsel of Record (by ECF)